UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

 Pulse Network LLC
 §

 versus
 §

 Civil Action 4:14-cv-03391

 §

 Visa Inc.

DEFENDANT VISA'S MOTION FOR SUMMARY JUDGMENT

Visa moves for summary judgment pursuant to Federal Rule of Civil Procedure 56.

Undisputed material facts establish that Pulse lacks antitrust injury, that Visa's challenged debit strategies do not injure competition, or both.

In support of its motion, Visa submits:

- 1. Memorandum in Support;
- 2. Statement of Facts;
- 3. Declaration of Michael A. Rubin, Esq. and Exhibits thereto; and
- 4. Proposed Order.

Dated: August 15, 2017

SMYSER KAPLAN & VESELKA, L.L.P.

By:

Lee L. Kaplan
Attorney-in-Charge
State Bar No. 11094400
S.D. Id. No. 1840
700 Louisiana, Suite 2300
Houston, Texas 77002
(713) 221-2323
(713) 221-2320 (fax)
Email: lkaplan@skv.com

ATTORNEY-IN-CHARGE FOR VISA INC.

Of Counsel

John W. Keker (pro hac vice)
jkeker@kvn.com
Asim M. Bhansali
amb@kvn.com
KEKER, VAN NEST & PETERS LLP
633 Battery Street
San Francisco, CA 94111-1809
Telephone: (415) 391-5400
Fascimile (415) 397-7188

Mark R. Merley (pro hac vice)
mark.merley@apks.com
Michael A. Rubin (pro hac vice)
michael.rubin@apks.com
ARNOLD & PORTER KAYE
SCHOLER LLP
601 Massachusetts Avenue, N.W.
Washington, DC 20001
Telephone: (202) 942-5000
Facsimile: (202) 942-5999